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January 3, 2024

Re: *Williams-Israel v. Iris Energy Limited, et al.*, 1:24-cv-07046

The Honorable Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Dear Judge Kuo:

We represent IREN Limited (f/k/a Iris Energy Limited), Daniel Roberts, William Roberts, and Belinda Nucifora (collectively, “Defendants”) in the above-referenced action. Pursuant to Rule III(C) of the Court’s Individual Practices in Civil Cases, we write to request that the Court adjourn the initial conference currently scheduled for January 28, 2025 at 10:30am (ECF No. 5) until after the resolution of pending lead plaintiff motions and Defendants’ anticipated motion to dismiss the operative complaint in this action. This is the first such request for an adjournment.

This case is a putative class action asserting federal securities claims that are governed by the Private Securities Litigation Reform Act of 1995 (“PSLRA”). See 15 U.S.C. § 78u-4 et seq. Under the PSLRA, “all discovery and other proceedings shall be stayed during the pendency of any motion to dismiss, unless the court finds upon the motion of any party that particularized discovery is necessary to preserve evidence or to prevent undue prejudice to that party.” 15 U.S.C. § 78u-4(3)(B)(iv); see also *Merrill Lynch, Pierce, Fenner & Smith Inc. v. Dabit*, 547 U.S. 71, 81 (2006) (“Title I of the [PSLRA] . . . authorize[s] a stay of discovery pending resolution of any motion to dismiss.”). The PSLRA also requires the appointment of a lead plaintiff and lead counsel of the purported class, (15 U.S.C. § 78u-4(3)(B)), and several motions for appointment as lead plaintiff and lead counsel have been filed and are currently pending before the Court (ECF No. 14, 17, 18, 20). Pursuant to the Court’s October 21, 2024 Order granting Defendants’ motion for extension of time to answer the complaint, once the Court appoints a lead plaintiff and lead counsel in this action, counsel for Defendants will meet and confer with lead counsel regarding a proposed schedule for the filing of any consolidated or amended complaint and for the anticipated motion to dismiss the operative complaint. We therefore respectfully request that the initial conference scheduled for January 28, 2025, be adjourned pending resolution of the lead plaintiff motions and the adjudication of Defendants’ anticipated motion to dismiss.

Plaintiff Paul Williams-Israel, who filed the initial complaint, and Plaintiff Rick Bunney, who is the only plaintiff still pursuing a motion to be appointed as lead plaintiff, join in this request that the initial conference be adjourned. Of course, the parties are happy to appear at any time to discuss any issues the Court would like to address.

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Respectfully submitted,

/s/ Mari Grace

Mari Grace

cc: All counsel of record

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